

Staffing - inadequate with respect to supervisory position (no time shown)
- pay is very low; to attain the level needed, they should be 5% higher.

Concessions - has not requested (See FETC Act Section 402(b))

Program description - "Full & complete description" Section 402(b) missing.

- (1) Name of industry, of course, is missing
- (2) Enforcement - how does DOT/other informant maintain from State A. to office. Should there be an agreed upon procedure between them?
- (3) See Part 13(1)(d) of attached - all of this material is missing.
- (4) No priority list of ports

The submitted, in summary, consists of bits and pieces, none of which is coherently related in a working program.

Flow chart is the only indication of how they plan to operate and is very superficial.

Some missing items:

1. Nothing about how all necessary APPS are to be obtained
2. nothing about APP FCC
3. Nothing about sending APP ^{DRAFT} to other concerned agencies or to discharger for preliminary comment
4. Flow chart implies that EPA gets to review draft but nothing indicated about subsequent modification prior to P.N.
5. Same as above for EPA review of DRAFT revisions after P.N.
6. No EPA notification or consultation in relation to legal proceedings re application
7. No data bank entry shown (or other reporting)
8. ~~Nothing at all shown for compliance action after issuance~~

"Functional Statement" of Pollution Technical Review Branch does not provide much on their NPOES role although this is the primary branch operating the program.

Detailed procedures may be in repts submitted but are not included in the May 4, 74 submission.

No indication of basis for any priorities on inventory of dischargers.

No indication of State's plan with regard to outstanding apps at the time of delegation - when will they be issued?

No submission of any forms or formats which may differ from those used by EPA - or if there will be no differences.

No names submitted of members of permit issuing board, body, etc. for assurance of no conflict of interest.

The flow chart is too superficial to demonstrate either knowledge of, or intention to, comply with the various specific regulatory requirements.

~~1 manpower looks on (9.3 people)~~

- with 1.8 people assigned to lab support, it seems strange that only \$500 is devoted to lab supplies.

What supplies cost *\$37,600 ?

The "Note" about "available funds" leaves doubt as to how much is intended for NPDES.